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Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board Region

Insert RB letterhead



Gray Davis
Governor

XXXXXXXXXX, 2003

DRAFT

Addressee
Facility Address,
City, State, Zip Code

REQUEST FOR A TECHNICAL REPORT ON EMERGENT CHEMICALS SOURCES AND SAMPLING, FACILITY NAME AND ADDRESS

Dear _____:

The California Regional Water Quality Control Board (Regional Board) is the public agency with primary responsibility to protect groundwater and surface water quality within this Region. This Regional Board requests your assistance in identifying potential sources of emergent chemicals, {perchlorate, n-nitrosodimethylamine (NDMA), 1,4-dioxane, 1,2,3-trichloropropane, chromium VI, and polybrominated diphenyl ether (PBDE)}, in soil, groundwater or surface water at active and former military facilities. Our priority in this regard is assessing the groundwater quality beneath former and current military facilities for the presence of emergent chemicals of concern, in drinking water, as identified by the California Department of Health Services.

SUMMARY

The detection of emergent chemicals in groundwater, above State and Federal maximum contaminant levels (MCLs) or action levels (ALs) have recently caused this agency to reassess the threat posed to groundwater resources used for domestic supply. Furthermore, many drinking water supply wells have been shut down throughout California due to pollution from one or more of these emergent chemicals. These recent developments have raised concerns about losing beneficial uses of groundwater due to the presence of these chemicals in soil, surface water, or groundwater.

The presence of these emergent chemicals can increase the costs of effective remediation and has caused the reassessing of cleanup remedies. All of these emergent chemicals have acute to chronic health effects in humans even though some have been found at very low concentrations, i.e. nanograms/Liter (parts per trillion (ppt)). In addition, some of these chemicals are suspected carcinogens. The enclosure to this letter provides additional emergent chemical information.

DIRECTIVES

Based upon our knowledge of military facilities, we believe that sources for emergent chemicals potentially exist at active or former military facilities, which can date back to the early 1940's. We are requesting your assistance in identifying sources of emergent chemical at all areas of concern

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(AOC), installation restoration (IR) and operable unit (OU) sites within the facility. These AOC, IR, and OU, sites should include, but are not limited to:

- Areas used for storing chemicals and pesticides,
- Military ordnance/counter-measures,
- Bulk explosives, storage and disposal,
- Firing and bombing ranges,
- Mock battle training locations,
- Missile test sites,
- Waste sumps, clarifiers, and settling ponds,
- Missile/rocket launch pads,
- Ordnance detonation/disposal sites,
- Decommissioned missile silos,
- Areas where these chemicals have been found and/or are being remediated
- Suspected areas where chemicals were used, transferred, processed, incinerated, or disposed.

In order to assist us in identifying potential sources of emergent chemicals we are asking that source evaluation reports are prepared, and follow-up sampling conducted. Please prepare and submit a source evaluation report for the Department of Toxic Substances Control (DTSC) and Regional Board review, by **September 1, 2003**. At a minimum, the source evaluation report should include the following:

- a. Property ownership and land use history from original land grant;
- b. Locations where emergent chemicals were used and stored on-site;
- c. Location and time specific quantities of emergent chemicals used;
- d. Management procedures for the use of emergent chemicals and emergent chemical wastes used and/or generated on site;
- e. Emergent chemical data from soil, surface water, and groundwater already collected;
- f. Schedule for when this data will be collected at sites with no existing soil, surface water and groundwater data on emergent chemicals; and

A proposal for collecting emergent chemical data for soil, surface water and groundwater must be presented in the source evaluation report for AOC, IR, and OU sites where the potential for sources of emergent chemicals exists, and water or soil analytical data does not exist. Sites with groundwater pump and treat systems in place should also sample the influent to the treatment systems and report the results. The sampling proposal should include the following:

- a. Locations, numbers, and identifies proposed wells, surface water locations, and treatment system effluent systems to be sampled;
- b. The rationale for sampling these selected wells;
- c. Proposed soil sampling locations and rationale;
- d. A brief description of the methodology proposed to be used to collect the soil and/or water samples: and
- e. A schedule for sampling these soils, surface waters and wells.

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After Regional Board, or DTSC at facilities where DTSC is the lead, staff have reviewed and concurred with the number and locations of proposed sampling locations, these samples should be collected. Ideally groundwater monitoring wells and surface water locations should be sampled during the next scheduled monitoring event for the emergent chemicals listed below and the results submitted to the agencies in the next groundwater monitoring report for the facility.

TESTING REQUIREMENTS

Listed below are the emergent chemicals we are interested in, and our recommendations with respect to acceptable testing procedures for each of the specified emergent chemicals:

<u>Emergent Chemical</u>	<u>Acceptable Test Method</u>	<u>Reporting Limit</u>
1. Perchlorate	U. S. EPA Method 314.0	4 µg/L
2. N-Nitrosodimethylamine (NDMA)	U. S. EPA Method 1625	0.002 µg/L
3. 1,4-Dioxane	U. S. EPA Method 8270	2 µg/L
4. 1,2,3-Trichloropropane	U. S. EPA Method 524.2	0.005 µg/L
5. Total/Hexavalent Chromium	U. S. EPA Method 200.8/218.6	1 µg/L/0.3 µg/L
6. Polybrominated Diphenyl Ether	U. S. EPA Method 8270	2 µg/L

The use of these analytical testing procedures will provide consistency in the analysis of groundwater samples and provide the high quality data necessary to make appropriate regulatory decisions.

If you have any questions, please contact _____ at (XXX) ### - ####.

Sincerely,

Executive Officer

Enclosure: Emergent Chemical Information

cc: Regional Board Attorney, Office of Chief Counsel, State Water Resources Control Board
 DTSC Facility Project Manager, California Department of Toxic Substances Control,
 Mr. Tony Landis (N. CA) or Mr. John Scandura (S. CA), California Department of Toxic
 Substances Control
 Ms. Vera Melynk-Vecchio, California Department of Health Services
 Ms. Elizabeth Adams, U. S. EPA, Superfund Division, Region IX, San Francisco
 Mr. Kevin Mayer, U. S. EPA, Superfund Division, Region IX, San Francisco

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